

STEPHANIE M. HINDS (CABN 154284)
Attorney for the United States

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

DAVID J. WARD (CABN 239504)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Fax: (415) 436-7230
david.ward@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 20-00353 WHO
)	
Plaintiff,)	MOTION TO UNSEAL
)	
v.)	
)	
BALMORE HERNANDEZ,)	
)	
Defendant.)	
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On October 8, 2020, defendant Balmore HERNANDEZ pled guilty before the Court to one count of Conspiracy to Commit Honest Services Wire Fraud in violation of 18 U.S.C. § 1349. *Dkt 32*. At the request of the government, Exhibit A of the Plea Agreement, containing the factual basis for the plea, was filed under seal because of the government's then-ongoing investigation of the facts underlying defendant HERNANDEZ's conduct.

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MOTION TO UNSEAL/PROPOSED ORDER 1
CR 20-00353 WHO

1 There is no longer an investigative need by the government to keep defendant HERNANDEZ's
2 factual admissions in Exhibit A under seal. Therefore, the government respectfully requests that this
3 Court order that Exhibit A to defendant HERNANDEZ's plea agreement be unsealed.

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6 STEPHANIE M. HINDS
Attorney for the United States

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8 Dated: May 4, 2023

/s/ David J. Ward
9 DAVID J. WARD
Assistant United States Attorney

10 For good cause shown, it is **SO ORDERED**.

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13 Dated: May 23, 2023

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HONORABLE WILLIAM H. ORRICK
United States District Court Judge